

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TV INTERACTIVE DATA CORPORATION, a  
California Corporation,

Plaintiff,

v.

SONY CORPORATION; SONY COMPUTER  
ENTERTAINMENT INC.; SONY COMPUTER  
ENTERTAINMENT AMERICA, INC.; SONY  
CORPORATION OF AMERICA; SONY  
ELECTRONICS, INC.; SAMSUNG ELECTRONICS  
CO., LTD.; SAMSUNG ELECTRONICS AMERICA,  
INC.; ROYAL PHILIPS ELECTRONICS N.V.;  
PHILIPS ELECTRONICS NORTH AMERICA  
CORPORATION; TOSHIBA CORPORATION;  
TOSHIBA AMERICA, INC.; TOSHIBA AMERICA  
CONSUMER PRODUCTS, L.L.C.; VICTOR  
COMPANY OF JAPAN, LTD.; JVC AMERICAS  
CORP.; LG ELECTRONICS, INC.; LG  
ELECTRONICS U.S.A., INC.; ZENITH  
ELECTRONICS LLC; PIONEER CORPORATION;  
PIONEER ELECTRONICS (USA) INC.; SHARP  
CORPORATION; SHARP ELECTRONICS  
CORPORATION; FUNAI ELECTRIC CO., LTD.;  
FUNAI CORPORATION, INC.; D&M HOLDINGS  
INC.; D&M HOLDINGS US, INC.; AND DENON  
ELECTRONICS (USA), LLC,

Defendants.

Case No. C 10-00475 JF

~~[AMENDED STIPULATION AND  
PROPOSED]~~  
**ORDER/COMMISSION FOR  
DEPOSITIONS TO BE TAKEN IN  
JAPAN**

**DEPONENT:  
SONY CORPORATION;  
SONY COMPUTER  
ENTERTAINMENT INC.**

**JOINT STIPULATION**

Beginning June 15, 2011, TV Interactive Data Corp. ("TVI") will begin depositions of certain witnesses from Sony Corporation and Sony Computer Entertainment Inc. ("Sony") at the U.S. Embassy in Tokyo. The Stipulation and Proposed Order/Commission For Depositions To Be Taken In Japan filed on May 11, 2011 inadvertently stated that the depositions will occur in Osaka instead of Tokyo. Sony and TVI hereby submit and jointly stipulate to the following Amended Proposed Order/Commission for Depositions to be Taken in Japan.

**FOR PLAINTIFF TV INTERACTIVE DATA CORP.**

ROBINS, KAPLAN, MILLER & CIRESI,  
L.L.P.

By: /s/Trevor J. Foster  
Trevor J. Foster (pro hac vice)  
E-mail: tjfoster@rkmc.com  
Richard M. Martinez (pro hac vice)  
E-mail: rmmartinez@rkmc.com  
Sang Young Adam Brodie (pro hac vice)  
E-mail: sybrodie@rkmc.com  
Dated: May 12, 2011

**FOR DEFENDANTS SONY CORPORATION AND SONY COMPUTER ENTERTAINMENT INC.:**

LERNER, DAVID, LITTENBERG  
KRUMHOLZ & MENTLIK, LLP

By: /s/Fahd K. Majiduddin  
Fahd K. Majiduddin  
fmajiduddin@ldlkm.com  
Gregory S. Gewirtz  
E-mail: ggewirtz@ldlkm.com  
Jonathan A. David  
E-mail: jdavid@ldlkm.com  
Bryan J. Sommese  
E-mail: bsommese@ldlkm.com  
Dated: May 12, 2011

**~~PROPOSED~~ ORDER/COMMISSION FOR DEPOSITIONS TO BE TAKEN IN JAPAN**

TO: ANY CONSUL OR VICE CONSUL OF THE UNITED STATES OF AMERICA  
AT TOKYO, JAPAN

Upon the application of Complainant TV Interactive Data Corporation (“TVI”), in *TVI Data Corp. v. Sony Corp., et al.*, Inv. No. 10-00475, before the U.S. District Court for the Northern District of California, and pursuant to Article 17 of the United States – Japan Consular Convention,

**IT IS ORDERED THAT** the depositions on notice of the following volunteering witnesses be taken at the U.S. Embassy in Tokyo, Japan commencing on or about June 15, 2011, at 8:30 a.m. and terminating on or about June 30, 2011 at 4:00 p.m., and that any documentary exhibits in connection therewith be marked:

**Sony Corporation**

1-7-1 Konan, Minato-ku  
Tokyo 108-0075, Japan

Koichi Nakamura  
Yoshihiro Horibata  
Takashi Tajiri  
Mitsuhiko Awata  
Maokoto Nakazawa  
Akira Minegishi  
Mitsuru Ito  
Tsuguhiro Mukai  
Yuichi Yazawa  
Shin Ina

**Sony Computer Entertainment, Inc.**

1-7-1 Konan, Minato-ku  
Tokyo 108-0075, Japan

Takuro Kitayama  
Tsutomu Inui  
Takeshi Hashimoto  
Tomonori Shimomura  
Hideyuki Agata  
Toru Akazawa

1  
2  
3 Counsel for Defendants Sony Corporation and Sony Computer Entertainment, Inc. who  
4 will participate in said depositions are Gregory S. Gewirtz, Jonathan A. David, Orville R.  
5 Cockings, Fahd K. Majiduddin, Claus Melarti, and Michael Edelman.

6 Members of Sony Corporation's Intellectual Property Division that may attend the  
7 depositions include Minoru Tanaka, Shizuka Sayama, Risa Endo, Miyano Yamauchi, Hiroaki  
8 Honda, Kazuhide Kenmochi, Yusuke Shimizu, Naoko Ishizuka, and Shiho Igarashi. Members of  
9 Sony Computer Entertainment, Inc.'s Legal Department and Intellectual Property Division that  
10 may attend the depositions include Masaki Kasahara, Hiroshi Morita, Hiroyuki Hanaya,  
11 Tomonori Okuwaki, Tomoe Ban, Yoko Iguchi, and Toshiya Suzuki.


12 Two potential check interpreters that may be attending the depositions include Ai Miyake  
13 and Toyu Yazaki.

14 Counsel for TVI who will participate in said depositions are Richard M. Martinez and  
15 Trevor J. Foster. In addition, James Tornes and Andrew Wolfe may attend on behalf of TVI.

16 Jared Taylor will act as interpreter.

17 The proceedings will be recorded by Stirewalt & Associates, court reporter and  
18 videographers. Please cause the testimony of said witnesses to be recorded by video and reduced  
19 to writing; the depositions to be signed by said witnesses; said deposition testimony to be  
20 annexed to your Commission and closed under your seal; and the return of these materials to this  
21 Court with all convenient speed.  
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1 WITNESS, the Honorable Jeremy Fogel, United States Judge of the United States District Court,  
2 Northern District of California, this 16th day of May 2011.

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4 \_\_\_\_\_  
5 Honorable Jeremy Fogel  
6 United States Judge  
7 United States District Court  
8 Northern District of California  
9 San Jose Courthouse, Courtroom 3 – 5th Floor  
10 280 South 1st Street  
11 San Jose, CA 95113

8 I hereby certify that the signature above is that of the Honorable Jeremy Fogel, United States  
9 Judge of the United States District Court, Northern District of California.

10 \_\_\_\_\_ Clerk of the Court

11 By: \_\_\_\_\_

12 Deputy Clerk: \_\_\_\_\_

13 Seal:  
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